

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Darryl Marico KING

Case No. Case: 2:24-mj-30521
Assigned To : Unassigned
Assign. Date : 12/9/2024
Description: CMP USA V. KING (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 9-26-2024, 10-9-2024, 10-21-24 in the county of Wayne and Livingston in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1)

Distribution or Possession with Intent to Distribute Controlled Substances

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 9, 2024

City and state: Detroit, Michigan



Complainant's signature

Joshua White, Special Agent (ATF)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A CRIMINAL COMPLAINT**

I, Joshua White, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and I have served as such since July 2022. Before serving as an ATF Special Agent, I was employed by the United States Secret Service as a Uniformed Division Officer for three and a half years. My daily responsibilities while serving were to screen passholders and appointments who had access to the White House Grounds, assist with protectee movements onto and off of the White House Complex, and enforce D.C. Code, as well as Federal Law. I have completed the Federal Law Enforcement Training Center Uniformed Police Training program, and the Criminal Investigator Training Program with a total of over 800 hours of classroom and practical training. I have completed ATF's Special Agent Basic Training academy with over 500 hours of classroom and practical training. I am presently assigned to ATF's Lansing Office conducting narcotics/firearms investigations.

2. This affidavit is based on my personal knowledge and observations, law enforcement reports, review of relevant evidence, communications with other sworn law enforcement personnel, communications with others who have personal knowledge of the events and circumstances herein, and information gained through

my training and experience.

3. This affidavit is in support of a criminal complaint and arrest warrant for Darryl Marico KING for violations of 21 U.S.C. § 841(a)(1), Distribution or Possession with Intent to Distribute a Controlled Substance. This affidavit is submitted for the limited purpose of establishing probable cause. I have not included every fact known to law enforcement related to this investigation.

PROBABLE CAUSE

4. Law enforcement has been investigating KING for drug and firearms trafficking. Upon review of KING's criminal history, I located the following felony convictions for KING:

- a. 07/28/1992: 3rd Circuit Court of Michigan – Bank Robbery.
- b. 06/06/1995: 3rd Circuit Court of Michigan – Armed Robbery.
- c. 06/06/1995: 3rd Circuit Court of Michigan – Felony Weapons – Felony Firearm.
- d. 12/17/2007: 7th Circuit Court of Michigan – Controlled Substance – Possession less than 25 grams.

5. In late September 2024, investigators began preparing for a controlled purchase of narcotics from KING. Before the controlled purchase, an Undercover Law Enforcement Agent (UCA) engaged in recorded telephonic and text message communication with KING over cell phone to facilitate the transaction. The UCA

and KING agreed to meet in Howell, MI, for the UCA to purchase approximately three ounces of suspected cocaine for \$3,000.

6. On September 26, 2024, the UCA conducted the controlled purchase of drugs from KING. During the controlled purchase, the UCA identified KING as the individual he was meeting with. The UCA saw KING pull a clear plastic baggie filled with suspected cocaine from his pants, then the UCA purchased the suspected cocaine using prerecorded government funds. The plastic baggie containing the cocaine that KING sold to the UCA field-tested positive for the presence of cocaine.

7. On October 9, 2024, the UCA conducted a second controlled purchase of drugs from KING in Detroit, MI. At the deal location, the UCA gave KING \$6,400 in prerecorded government funds in exchange for approximately 4.5 ounces of suspected cocaine and one pound of suspected methamphetamine. For this deal, KING brought the drugs in a duffel bag. The UCA and KING also discussed the sale of firearms and KING stated that he has multiple semi-automatic rifles that he would sell the UCA for a total of \$1,300. The substances the UCA purchased from KING field-tested positive for the presence of cocaine and methamphetamine.

8. On October 21, 2024, the UCA conducted a third controlled purchase of drugs from KING in Howell, MI. At the deal location, the UCA met KING where the UCA then gave KING \$6,000 in prerecorded government funds in

exchange for two plastic baggies weighing approximately 6.45 ounces of suspected cocaine that KING pulled from his hooded pocket. During the controlled purchase, the UCA and KING discussed the sale of 1 kg of cocaine as well as the sale of firearms. The substances that the UCA purchased from KING field-tested positive for the presence of cocaine.

CONCLUSION

9. Based on the facts described above, I believe there is probable cause that DARRYL MARICO KING violated of 21 U.S.C. § 841(a)(1), Distribution or Possession with Intent to Distribute a Controlled Substance in the Eastern District of Michigan.

Respectfully submitted,



Joshua White, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: December 9, 2024